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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

560 Seventh Avenue Owner Secondary LLC,

Debtor.

Chapter 11

Case No. 23-11071-PB

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS

PLEASE TAKE NOTICE that Morris James LLP appears in the above-captioned chapter 11 cases as counsel to Independent Managers Kristine E. Eppes and Benjamin L. Hancock, (the “Independent Managers”) and such counsel hereby enters its appearance pursuant to 11 U.S.C. § 1109(b) and Fed. R. Bankr. P. 9010(b), and such counsel hereby requests, pursuant to Fed. R. Bankr. P. 2002 and 9007, Local Bankruptcy Rule 9074-1, and 11 U.S.C. §§ 342 and 1109(b), that copies of all notices, pleadings, and other papers given or filed in these cases be given and served upon them electronically or otherwise on:

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PLEASE TAKE FURTHER NOTICE THAT, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, hand delivery, e-mail, telephone, facsimile or otherwise filed or made with regard to the above-referenced case and proceedings herein.

PLEASE TAKE FURTHER NOTICE THAT neither this Notice of Appearance, nor any former or later appearance, pleading, claim or suit shall constitute a waiver of (1) the right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge, (2) the right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to these cases, (3) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, including defenses or objections to jurisdiction, setoffs, or recoupments to which the Independent Managers may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserves.

Dated: August 3, 2023

MORRIS JAMES LLP

/s/ Jason S. Levin

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